

Mark R. Borghese
Email: mark@borgheselegal.com
Borghese Legal, Ltd.
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145
702-382-0200
Fax: 702-382-0212

Reza Mirzaie
Email: rmirzaie@raklaw.com
Paul S. Kroeger
Email: pkroeger@raklaw.com
Stanley H. Thompson, Jr.
Email: sthompson@raklaw.com

C. Jay Chung
Email: jchung@raklaw.com
Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
310-826-7474
Fax: 310-826-6991

Attorneys for Plaintiff 2-Way Computing, Inc.

(Additional Counsel Listed on Signature Page)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

2-WAY COMPUTING, INC.

Plaintiff,

VS.

AT&T MOBILITY LLC and AT&T
MOBILITY LLC

Defendants

Case No. 2:15-cv-02230-GMN-(CWH)

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
FILE PROPOSED PROTECTIVE
ORDER**

(First Request)

Plaintiff 2-Way Computing, Inc. (“2-Way”) and Defendants AT&T Mobility LLC and AT&T Mobility II LLC (collectively, “ATTM”) by and through their counsel, hereby file this

1 Stipulation and [Proposed] Order to Extend the Deadline to File Proposed Protective Order. This
 2 request complies with Local Rules 6-1, 6-2, and 7-1. The litigation of this matter will be best
 3 served by the proposed extension. This is the first request to extend this deadline. This request is
 4 not made after the deadline.

5 On April 26, 2016, the Court entered the Discovery Plan and Scheduling Order in this
 6 matter, ECF No. 44, setting April 27, 2016 as the deadline for the parties to file a proposed
 7 protective order. The parties agree that a two-week extension of the proposed protective order
 8 deadline, to May 11, 2016, will permit the parties time to resolve any initial disagreements
 9 regarding the language of the proposed protective order and work toward submitting an agreed
 10 proposed order to the Court.

11 Accordingly, Plaintiff and Defendants respectfully request that the Court grant this request
 12 to continue the deadline to file a proposed protective order.

13 DATED: April 27, 2016

14 Respectfully submitted,

15 **RUSS, AUGUST & KABAT**

16 /s/ Stanley H. Thompson, Jr.
 17 Reza Mirzaie, Esq.
 18 Paul S. Kroeger, Esq.
 19 Stanley H. Thompson, Jr., Esq.
 20 C. Jay Chung, Esq.
 21 12424 Wilshire Boulevard, 12th Floor
 22 Los Angeles, California 90025

23 **BORGHESE LEGAL, LTD.**

24 Mark Borghese, Esq.
 25 10161 Park Run Drive, Suite 150
 26 Las Vegas, Nevada 89145

27 **Counsel for Plaintiff**
 28 2-Way Computing Inc.

**KILPATRICK TOWNSEND &
 STOCKTON LLP**

/s/ Laura K. Mullendore
 Steven D. Moore (*Pro Hac Vice*)
 smoore@kilpatricktownsend.com
 Two Embarcadero Center, Eighth Floor
 San Francisco, CA 94111
 Tel: (415) 576-0200
 Fax: (415) 576-0300

Kristopher L. Reed (*Pro Hac Vice*)
 kreed@kilpatricktownsend.com
 Laura Mullendore (*Pro Hac Vice*)
 lmullendore@kilpatricktownsend.com
 1400 Wewatta Street, Suite 600
 Denver, CO 80202
 Tel: (303) 571-4000
 Fax: (303) 571-4321

Jonathan E. Harris (*Pro Hac Vice*)
 jeharris@kilpatricktownsend.com
 1001 West Fourth Street

1 Winston-Salem, NC 27101
2 Tel: (336) 607-7300
3 Fax (336) 607-7500

4 **SNELL & WILMER LLP**
5 Kelly Dove (Nevada Bar No. 10569)
6 k dove@swlaw.com
7 3883 Howard Hughes Parkway, Suite 1100
8 Las Vegas, Nevada 89169
9 Tel: (702) 784-5200
10 Fax: (702) 784-5252

11 *Counsel for Defendants*
12 AT&T Mobility LLC and AT&T Mobility II LLC

13 **ORDER**

14 IT IS SO ORDERED.

15 DATED: April 28, 2016

16 
17 United States Magistrate Judge

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO FILE PROPOSED PROTECTIVE ORDER** by the method indicated:

_____ U.S. Mail

_____ U.S. Certified Mail

_____ Facsimile Transmission

_____ Overnight Mail

_____ Federal Express

_____ Hand Delivery

_____ X Electronic Filing/ECF

and addressed to the following:

Reza Mirzaie
Email: rmirzaie@raklaw.com
Paul S. Kroeger
Email: pkroeger@raklaw.com
Stanley H. Thompson , Jr.
Email: sthompson@raklaw.com
C. Jay Chung
Email: jchung@raklaw.com
Russ, August & Kabat

Attorneys for Plaintiff 2-Way Computing, Inc.

DATED: April 27, 2016

/s/ *Laura K. Mullendore*

An Employee of Kilpatrick Townsend & Stockton LLP